

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

THE UNITED STATES OF AMERICA

-vs-

HARRIS HICKMAN

**NOVEMBER 2015 GRAND JURY
(Impaneled 11/16/2015)**

**SUPERSEDING
INDICTMENT
14-CR-6160 EAW**

Violations:

Title 18, United States Code,
Sections 1594(c), 1591(a)(1),
1591(a)(2), 1591(b)(1), 1591(b)(2)
and 2
(4 Counts and Forfeiture
Allegation)

**COUNT 1
(Conspiracy to Commit Sex Trafficking)**

The Grand Jury Charges That:

Beginning in or about March 2014 and continuing to on or about June 3, 2014, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, HARRIS HICKMAN, did knowingly, willfully and unlawfully combine, conspire and agree with others, known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 1, a person known to the Grand Jury, a person under the age of 18 years, and to benefit, financially and by receiving anything of value, from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that Victim 1 had not attained the age of 18 years and that Victim 1 would be caused to

engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 1591(b)(2).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 2
(Sex Trafficking of a Minor)

The Grand Jury Further Charges That:

Between in or about March 2014 and on or about June 3, 2014, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, HARRIS HICKMAN, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, Victim 1, a person known to the Grand Jury, a person under the age of 18 years, and did benefit, financially and by receiving anything of value, from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that Victim 1 had not attained the age of 18 years and that Victim 1 would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(2) and 2.

COUNT 3
(Sex Trafficking with Force, Fraud or Coercion)

The Grand Jury Further Charges That:

Between in or about August 2012 and on or about June 3, 2014, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the

defendant, HARRIS HICKMAN, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, Victim 2, a person known to the Grand Jury, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, and a combination of such means, would be used to cause Victim 2 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1) and 2.

COUNT 4
(Sex Trafficking with Force, Fraud or Coercion)

The Grand Jury Further Charges That:

Between in or about January 2011 and on or about June 3, 2014, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, HARRIS HICKMAN, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, Victim 3, a person known to the Grand Jury, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, and a combination of such means, would be used to cause Victim 3 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1) and 2.

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of one or more of the offenses set forth in Counts 1 through 4 of this Indictment, the defendant, HARRIS HICKMAN, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d)(1), any property, real and personal, that was used or intended to be used to commit or to facilitate the commission of such offense, including but not limited to the following:

1. One Cubot cell phone and battery, Cubot C11, IMEI 3599 3904 356 5247;
2. One Samsung cell phone model SCH-R740C, black, MEID 268435462905333655;
3. One Samsung/Cricket cell phone model SCH-R261, MEID HEX 2684 3546 1714 8369 68;
4. One Alcatel cell phone model A392 G, black, with SIM card, IMEI 013513000221538; and
5. One black iPhone inside mail pouch, IMEI 012843003456034.

If any of the property described above, as a result of any act or omission of the defendant:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the Court;

4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 1594(d)(1) and Title 21, United States Code, Section 853(p).

DATED: Rochester, New York, March 10, 2016.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

s/FOREPERSON